

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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MARK SOKOLOW, *et al.*,

Plaintiffs,

Docket No:
04-CV-397 (GBD) (RLE)

- against -

THE PALESTINE LIBERATION ORGANIZATION,
et al.,

Defendants.

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**PLAINTIFFS' APPLICATION PURSUANT TO FED. R. CIV. P. 28(b)(1)(D) TO
APPOINT COMMISSIONERS FOR THE TAKING OF DEPOSITIONS ABROAD**

Plaintiffs hereby request that, pursuant to Fed. R. Civ. P. 28(b)(1)(D), the Court appoint Fiona Farson, Christina Yianni, Claire Hill, and Thelma Harries as Commissioners of this Court, authorized to administer oaths and record testimony at depositions conducted outside the United States in this matter.

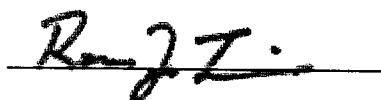
Three of Defendants' expert witnesses currently reside in Europe, and the parties have agreed that depositions of those experts will take place in London, England. Fed. R. Civ. P. 28(b)(1)(D) provides that a deposition may be taken in a foreign country "before a person commissioned by the court to administer any necessary oath and take testimony."

Ms. Farson, Ms. Yianni, Ms. Hill, and Ms. Harries are all highly experienced court reporters based in London who have been retained by Plaintiffs for the purpose of taking depositions outside of the United States in this matter. They have all covered numerous depositions for United States court cases in the past, and they are all disinterested as required under Fed. R. Civ. P. 28(c).

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order appointing Ms. Farson, Ms. Yianni, Ms. Hill, and Ms. Harries as Commissioners of this Court, authorized to administer oaths and record testimony at depositions conducted outside the United States in this matter.

November 5, 2013

Respectfully Submitted,



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Co-counsel for Plaintiffs

Co-counsel for Plaintiffs Varda Guetta; Shayna Gould; Rabbi Leonard Mandelkorn; Nurit Mandelkorn; Shaul Mandelkorn; Dr. Larry Carter, individually and as personal representative of the Estate of Diane ("Dina") Carter; Shaun Choffel; Dr. Alan J. Bauer, individually and as natural guardian of plaintiffs Binyamin, Daniel, and Yehuda Bauer; Revital Bauer, individually and as natural guardian of plaintiffs Binyamin, Daniel, and Yehuda Bauer; Yehonathon Bauer; Katherine Baker, Rebekah Blutstein, Richard Blutstein; and incoming co-counsel for all Plaintiffs